

ASSURANCE OF VOLUNTARY COMPLIANCE

In the matter of:

Dubord Marketing, Inc., dba Cover One and/or Direct Way; and

Spiro Tzicas;

Respondents.

The above-named Respondents enter into this Assurance of Voluntary Compliance (AVC) in order to resolve allegations of the Iowa Attorney General relating to Respondents' pre-AVC charging of \$12,257.10 to the financial institution accounts of forty-five (45) Iowa residents on behalf of the marketer of a medical discount program. The Attorney General alleges that the medical discount program marketing that purportedly gave rise to such charges violated the Iowa Consumer Fraud Act, Iowa Code § 714.16 ("CFA") and/or the Iowa Buying Club Memberships Law, Iowa Code Ch. 552A ("BCL"), and that such charges were unauthorized or otherwise unlawful. The undersigned representative of the Attorney General acknowledges that these are the only allegations of unauthorized or unlawful acts by Respondents at this time of which such representative is aware. Both Respondents and the Attorney General acknowledge that Respondents are not admitting any violation of the CFA, BCL or any other law, that Respondents are not conceding the propriety of personal jurisdiction over Mr. Tzicas, a Canadian citizen and resident, and that Respondents are entering into this Agreement to fully and finally resolve these allegations.

The Attorney General releases Respondents, and their officers, directors, shareholders, employees, attorneys, representatives, heirs, successors and assigns, from all liability under the CFA and BCL, and all other applicable laws enforced by the Consumer Protection Division, for the above-described marketing to the above-referenced forty-five Iowa residents and for the above-referenced charges purportedly resulting from such marketing, such release to take effect upon timely receipt by the Attorney General from Respondents of the payment described below.

Respondents, and each of them, agree: (1) to refrain from engaging or participating, directly or indirectly, in the marketing to Iowa residents of (a) any medical discount program, or any (other) membership program subject to the BCL; and/or (b) any merchandise subject to the CFA; including in each instance charging financial institution accounts in connection with any such marketing; (2) to pay \$12,257.10 to the Iowa Attorney General on or before February 6, 2017 to be used in the Attorney General's discretion to make refunds to the above-referenced forty-five Iowans, with any funds remaining after reasonable efforts to go into the fund created by Iowa Code § 714.16A; (3) to refrain from any use or transfer of the names of Iowans who are or were eligible for a refund under (2) above; (4) to respond fully and promptly to reasonable requests from the Attorney General for information or materials relating to the activities prohibited above or compliance with this AVC; and (5) that any future violation of this AVC shall constitute a



violation of the CFA, and that any such AVC violation if proved by a preponderance of evidence shall give rise to civil penalties and other remedies as set forth in the CFA and/or other applicable law.

Date: JAN. 17, 2017



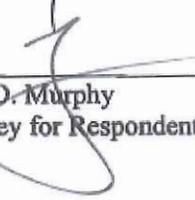
Dubord Marketing, Inc.
by Spyros Tzicas

Date: JAN. 17, 2017



Spyros Tzicas

Date: July 17, 2017



Mark D. Murphy
Attorney for Respondents

Accepted by:

Date: January 27, 2017



Steve St. Clair
Assistant Iowa Attorney General

